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Reply To:
Garden City Office

May 11, 2011

via ELECTRONIC FILING

Honorable Petrese B. Tucker
United States District Court
Eastern District of Pennsylvania
9613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: USA v. Jon J. Lackner
09-CR-813 (PBT)

Dear Judge Tucker:

I am writing concerning the motion to suppress pending before the Court and the upcoming trial schedule and to request a conference call if the Court deems that appropriate.

As to the motion, the defense received the Government's opposition and would like to submit a reply on or before Monday May 16, 2011. I have spoken to the AUSA who has consented to this request. Because the suppression motion, if granted, would effectively eliminate the counts added in the latest superseding indictment and relieve the Government of the burden to produce a witness from Turkey, both parties would respectfully request any hearings be conducted prior to the scheduled start of the trial.

Regarding the schedule, when we were last in Court we agreed that the trial would begin on June 13, 2011 subject to my ability to move a murder trial that had been previously scheduled for June 6, 2011. That trial has been moved so I am available to conduct the trial which the court advanced to

June 6th. However, the government has a witness being flown from Turkey who will not be available until June 13th. Further, my client will not be available on June 8th and 9th because of the religious observance of a Shavout. Therefore, he can only sit for the trial on June 6th, 7th and 10th and then the entire week of the 13th, if necessary. Both parties thought it appropriate to inform the Court of these scheduling issues.

The parties are available for a conference call on a mutually convenient time for the Court.

Respectfully submitted,

QUADRINO & SCHWARTZ, P.C.

By: /s/ Bruce A. Barket
Bruce A. Barket

BAB:lr

cc: Jessica Natali (via ECF)